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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
ex rel. RICHARD CHESBROUGH, M.D.,
and KIM CHESBROUGH,

Plaintiffs,

vs.

UNIVERSAL IMAGING, INC.,
MRI LEASING, LLC, d/b/a PREMIER
LEASING AND MANAGEMENT
SERVICES, LLC, PHILLIP J. YOUNG,
MARK LAUHOFF, and GWENDOLYN
WASHINGTON, Jointly and Severally,

Defendants,

and

TCF BANK,
TCF INVESTMENTS,
JP MORGAN CHASE,
FIFTH THIRD BANK,
CHASE BANK,
COMERICA BANK,
GREGORY SCHWARTZ & CO.

Garnishees.

Corr. - 29 Dec 11 - 817
Amended Answer
Mark Lauhoff

CIV No. 5:06-cv-15638-JCO-VMM
HON. JOHN CORBETT O'MEARA
MAG. JUDGE VIRGINIA M. MORGAN

FILED
FEB 24 2012
CLERK'S OFFICE
DETROIT

ANSWER OF THE GARNISHEE

Sp. Darenbourg, DEPOSES AND SAYS:

A. IF GARNISHEE IS AN INDIVIDUAL: That he/she is Garnishee herein doing business in
the name of _____.

IF GARNISHEE IS A PARTNERSHIP:

That he/she is a _____ of a partnership composed of which Garnishee is
a partner

IF GARNISHEE IS A CORPORATION

That he/she is the risk ops analyst of Garnishee, a corporation, organized under the
laws of the State of New York

B. On 12/29/11, Garnishee was served with the Writ of Continuing Garnishment. For the
pay period in effect on the date of service _____.

Yes ____ No ☒

1 Defendant was in my/our employ.

2. Pay period is ____ weekly, ____ bi-weekly ____ semi-monthly, ____
monthly

Enter date present pay period began. _____

(Present means the pay period in which this order and notice of garnishment
were served).

Enter date above pay period ends. _____

3. Enter amount of net wages. Calculate below

(a) Gross Pay \$ _____

(b) Federal Income Tax \$ _____

(c) F.I.C.A. Income Tax \$ _____

(d) State Income Tax \$ _____

(e) City/Local Income Tax \$ _____

Total of tax withholdings \$ _____

Disposable Earnings \$ _____
(a less total of b,c,d,e)

(f) 25% of disposable earnings \$ _____

4. Have there been previous garnishments which are presently in effect. (Including but not limited to child support and alimony.)

If the answers is yes, describe below

C. The Garnishee has custody, control or possession of the following property (other than disposable earnings indicated above), in which the Debtor maintains an interest, as described below:

	<u>Description of Property</u>	<u>Approximate Value</u>	<u>Description of Debtor's Interest in Property</u>
1	Chg# 67719	0.00	as of 12/29/11 joint owned
2	Omni # 6006	0.00	as of 12/29/11 sole owned
3			

D. Garnishee anticipates owing to the judgment-debtor in the future, the following amounts: *NA*

	<u>Amount</u>	<u>Estimate date or Period Due</u>
1	\$ _____	_____

2. \$ _____
3. \$ _____
4. \$ _____

E. Check the applicable line below if you deny that you hold property subject to this order of garnishment.

___ The Garnishee makes the following claim of exemption on the part of Defendant:


___ Or has the following objections, defenses, or set-offs to Plaintiff's right to apply Garnishee's indebtedness to Defendant upon Plaintiff's claim:

___ The Garnishee was then in no manner and upon no account indebted or under liability to the defendant, AAA, and that the Garnishee did not have in his/her possession or control any property belonging to the defendant, or in which the Garnishee has an interest; and is in no manner liable as Garnishee in this action.

F The Garnishee mailed a copy of this answer by first-class mail to (1), at: see attached list

_____ and (2) the attorney for the United States, Joan E. Hartman, Assistant United States Attorney 211 W Fort St., Ste. 2001, Detroit, Michigan 48226.

I declare under penalty of perjury that the above is true to the best of my knowledge and belief.


Garnishee J.P. Jarensbourg

Date: 2-21-12

ATTACHMENT TO ANSWER OF GARNISHEE

The original answer must be mailed to:

Clerk, United States District Court
Theodore Levin Courthouse
231 W Lafayette, 5th Floor
Detroit, Michigan 48226

and a copy of this answer to:

United States Attorney's Office
Attn: Joan E. Hartman
211 W Fort Street
Suite 2001
Detroit, Michigan 48226

and a copy of this answer to the defendants/debtors:

Phillip J Young
32924 Brookside Circle
Livonia, Michigan 48152-1419

MRI Leasing
c/o Phillip J. Young, Resident Agent
1159 E. Michigan Avenue
Ypsilanti, Michigan 48198

Universal Imaging, Inc.
c/o Phillip J. Young, Resident Agent
1159 E. Michigan Avenue
Ypsilanti, Michigan 48198

Frank A. Lauhoff
19107 Chelton Drive
Beverly Hills, Michigan 48025

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HON JOHN CORBETT O'MEARA
MAG. JUDGE VIRGINIA M. MORGAN

COPY

WRIT OF CONTINUING GARNISHMENT

GREETINGS TO:

TCF Bank
TCF Investments
500 Joliet Road
Willowbrook, Illinois 60527
Attn. Legal Department

JP Morgan Chase
Chase Bank
7610 W. Washington St., IN-4054
Indianapolis, Indiana, 46231
Attn: National Subpoena Proc

Fifth Third Bank
5050 Kingsley Road
MD 1MOC2Q
Cincinnati, Ohio 45263
Attn: Legal Operations

Comerica Bank
Internal Services
Post Office Box 75000
Detroit, Michigan 48275-7549
Attn: Internal Services - Garnishments

Gregory J. Schwartz & Co., Inc.
3707 W Maple Road
Bloomfield Hills, Michigan 48301-2295
Attn: Gregory J. Schwartz, Resident Agent

An Application for a prejudgment Writ of Garnishment against the property of UNIVERSAL IMAGING, INC., MRI LEASING, LLC, PHILLIP J YOUNG, and MARK A. LAUHOFF was filed with this Court on December 27, 2011, along with a Complaint of the United States in the above-captioned case seeking recovery of a debt in the amount of \$148,500,000 from the above-named debtors.

The Application seeks authority to garnish all property in your possession, custody or control in which any or all of the debtors have a substantial nonexempt interest, to be held in satisfaction of the debt owed in the above-captioned case, and to satisfy the judgment, interest and costs, as the United States may recover on its claim.

You are required by law to answer in writing, under oath, within ten (10) days, whether or

not you have in your custody, control or possession, any property in which any or all of the debtors have an ownership interest.

You must file the original written answer to this writ within ten (10) days of your receipt of this writ with the United States District Court Clerk at: Theodore Levin United States Courthouse, 231 W Lafayette, Detroit, Michigan 48226. Additionally, you are required by law to serve a copy of your answer to this writ upon the debtors at the following addresses:

Phillip J Young
32924 Brookside Circle
Livonia, Michigan 48152-1419

MRI Leasing LLC
c/o Phillip J Young, Resident Agent
1159 E. Michigan Avenue
Ypsilanti, Michigan 48198

Universal Imaging, Inc.
c/o Phillip J. Young, Resident Agent
1159 E. Michigan Avenue
Ypsilanti, Michigan 48198

Mark A. Lauhoff
19107 Chelton Drive
Beverly Hills, MI 48025

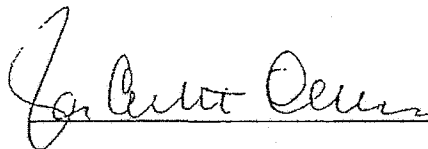
Also serve the United States Attorney, 211 W Fort Street, Suite 2001, Detroit, Michigan 48226, Attn: Joan E. Hartman. Filing and service may be accomplished by using the United States mail.

If you fail to answer this writ or withhold property in accordance with this writ, the United States of America may petition the Court for an order requiring you to appear before the Court. If you then fail to appear the Court may enter a judgment against you for the value of the debtors' non-exempt property

It is unlawful to pay or deliver to any debtor or any other person any item garnished by this writ. Should you do so, the Court may enter a judgment against you for the value of the debtors' non-exempt property. You may also be held liable for a reasonable attorney's fee to the United States of America.

Service of this writ upon you may be accomplished by facsimile, first class mail or personal service, and is effective upon your receipt by any such means. The Federal Debt Collection Procedure Act states that, except as otherwise provided, "the Federal Rules of Civil Procedure shall apply with respect to actions and proceedings under this chapter." Fed. R. Civ. P. 4(c) provides that the Court may appoint a special process server to assist the U.S. Marshals in effectuating the prejudgment remedies set forth in the proposed Writ. I hereby appoint Jonathan Sonbay, Investigator, United States Attorney's Office, and Steve Rinaldi, Special Agent, U.S. Department of Health and Human Services Office of Inspector General, as special process servers.

Questions should be directed to the United States Attorney's Office, 211 W. Fort Street, Detroit, Michigan 48226, Attn: Assistant U.S. Attorney Joan E. Hartman, telephone number 313/226-9190.



United States District Judge

Dated:

December 28, 2011